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10 Attorneys for Defendants Singapore Airlines
11 Cargo PTE LTD and Singapore Airlines
Limited

Additional Counsel Appear on Signature Page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

16 Y. HATA & CO., LIMITED,
17 on behalf of itself and all others
similarly situated

Plaintiff,

19 | v.

20 AIR FRANCE-KLM; BRITISH
21 AIRWAYS, PLC; ASIANA AIRLINES
22 CO., LTD.; JAPAN AIRLINES
23 INTERNATIONAL CO., LTD.;
24 CATHAY PACIFIC AIRWAYS LTD.;
25 DEUTSCHE LUFTHANSA AG;
26 SCANDINAVIAN AIRLINES
27 SYSTEMS; UNITED AIRLINES, INC.;
28 UAL CORP.; CARGOLUX AIRLINES
INTERNATIONAL SA; LAN
AIRLINES SA; POLAR AIR CARGO,
INC.; ATLAS AIR WORLDWIDE
HOLDINGS, INC.; KOREAN
AIRLINES CO., LTD.; SINGAPORE
AIRLINES, LTD.; ACE AVIATION

CASE NO. CV 06-01916-SC

**STIPULATION PURSUANT TO
LOCAL RULE 6-1(a) TO EXTEND
TIME TO RESPOND TO
COMPLAINT**

AMENDED ORDER

1 HOLDINGS, INC.; AIR CANADA;
2 AMERICAN AIRLINES, INC.; AMR
3 CORPORATION; SINGAPORE
4 AIRLINES CARGO PTE LTD.; and
5 VIRGIN ATLANTIC AIRWAYS LTD.,
6

Defendants.

7 Pursuant to Local Rule 6-1(a), Defendants Singapore Airlines Cargo PTE
8 LTD and Singapore Airlines Limited respectfully request that this Court enter an
9 order extending the time in which Defendants must answer or otherwise plead to
10 this matter until the later of (1) the date when the Defendant would otherwise be
11 required to file a response pursuant to Federal Rule of Civil Procedure 12, or (2) 45
12 days after the JPML rules on a motion pending in *In re Air Cargo Shipping*
13 *Services Antitrust Litigation* (MDL No. 1775) and a consolidated complaint is filed
14 by all Plaintiffs in the single transferee Court and served on Defendants.¹ Plaintiff
15 Y. Hata & Co., Limited has consented to the requested extension. In support of
16 this motion, Defendants state:

17 1. The Complaint in this matter was filed on March 13, 2006. It seeks
18 relief under the Sherman Act and the Clayton Act against 20 defendants on behalf
19 of a putative class.

20 2. More than 50 similar actions have been filed in various jurisdictions
21 around the country.

22 3. Plaintiffs in various Districts have filed motions to consolidate and
23 transfer before the Judicial Panel on Multidistrict Litigation ("JPML"). On June
24 20, 2006, the JPML issued an order selecting the Eastern District of New York as

25 ¹ It is agreed between all parties that this agreed motion does not constitute a
26 waiver of any defense including, but not limited to, the defenses of lack of personal
27 or subject-matter jurisdiction or improper venue. The Defendants expressly
reserve their right to raise all defenses in response to either the current complaint
or any consolidated amended complaint that may subsequently be filed relating to
this action.

1
2 the transferee district for *In re Air Cargo Shipping Services Antitrust Litigation*,
3 MDL No. 1775.
4

5 4. Some, but not all, of the Defendants in this case have been served.
6 Some may contest service.
7

8 WHEREFORE, the Defendants request that this Court grant an extension of
9 the Defendants' time to answer, move or otherwise plead in response to the
10 complaint until the later of (1) the date when the Defendant would otherwise be
11 required to file a response pursuant to Federal Rule of Civil Procedure 12, or (2) 45
12 days after the JPML rules on a motion pending in *In re Air Cargo Shipping*
13 *Services Antitrust Litigation* (MDL No. 1775) and a consolidated complaint is filed
14 by Plaintiffs in the single transferee Court and served on Defendants.
15

16 Respectfully submitted,
17

18 Dated: June 26, 2006
19

20 KERSHAW, CUTTER & RATINOFF LLP
21

22 
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